

Enter the Handler Name, City and State you wish to search on:

Handler Name:

Wildcard searches are allowed (i.e. %dupont%, auto%, etc.).

City:

Wildcard searches are allowed (i.e. Ft%, %ville, etc.).

State:  

[Search](#) [Cancel](#) [Clear](#)

Your search has found 2 handler(s).

### Search Results

Act Loc	Handler Name	EPA Id	Street No.	Street Address	City	State	Zip Code	County	In a Universe
MI	<a href="#">EDDY E B PAPER INC</a>	MID005358247		1700 WASHINGTON AVE	PORT HURON	MI	48060	ST CLAIR	Y
MI	<a href="#">CROWN PAPER CO</a>	MID005357496		218 RIVERVIEW ST	PORT HURON	MI	48060	ST CLAIR	Y

URL: /CME/Handler\_srch.asp





5	W	M	I	D	0	0	5	3	5	7	4	9	6	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
U 1 2 2	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☒ 2. CORROSIVE  
(D002)

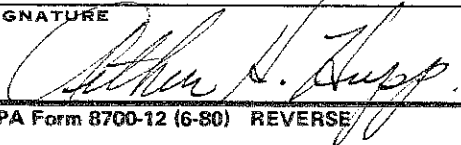
☐ 3. REACTIVE  
(D003)

☐ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



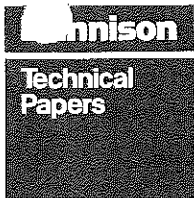
NAME &amp; OFFICIAL TITLE (type or print)

ARTHUR H. HUPP  
SENIOR VICE PRESIDENT

DATE SIGNED

3/17/81

Dunn Paper Company  
218 Riverview Street  
P. O. Box 227  
Port Huron, Michigan 48060  
Telephone (313) 984-5523



RECEIVED

MAR 19 1

WASTE MANAGEMENT BRANCH  
EPA REGION V

March 17, 1981

A. Bloom  
US EPA 5AHWM  
230 South Dearborn  
Chicago, Illinois 60604

*Phone 3-20-20*

MIDC05357496

Dear Ms. Bloom:

Enclosed is our completed EPA form 8700-12 Notification of Hazardous Waste Activity. I am looking forward to your call regarding our generator number.

Thank you for your cooperation.

Very truly yours,

DUNN PAPER COMPANY

*Ronald G. Koglin*

Ronald G. Koglin  
Technical Supervisor

RGK/njh

Enclosure

MAR 19 1981



## ENVIRONMENTAL PROTECTION AGENCY

## GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.  
Read All Instructions Carefully Before Making Any Entries on Form

## I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

See Attachment  
✓

- Non-handler  
2 Small Quantity Generator  
4 Exempt  
5 Beneficial Use  
9 Closed

Please print/type with elite type (12 characters per inch)

## II. GENERATOR'S EPA I.D. NUMBER

F M I D O C 5 3 5 7 4 9 6 1 1  
1 2 13 14 15 T/A C

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☒ Other No Planned Change

C303 ENTRY (OFFICIAL USE ONLY): ☐

## III. NAME OF INSTALLATION

DUNN PAPER CO  
30 69

## IV. INSTALLATION MAILING ADDRESS

3218 RIVERVIEW STREET  
15 16 45

Street or P.O. Box

41 PORT HURON MI 48106  
15 16 41 42 47 51  
City or Town State Zip Code

## V. LOCATION OF INSTALLATION (if different than section IV above)

5  
15 16 45  
Street or Route number

6  
15 16 41 42 47 51  
City or Town State Zip Code

## VI. INSTALLATION CONTACT

2 RONALD G. KOGLIN  
15 16 45  
Name (last and first)

313-984-1552  
46 55  
Phone No. (area code & no.)

## VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Ronald G. Koglin, Tech Supervisor Ronald G. Koglin 1-19-84  
Print/Type Name Title Signature of Authorized Representative Date Signed





Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

# Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: \_\_\_\_\_ Rec'd by: \_\_\_\_\_

## VIII. GENERATOR'S EPA I.D. NO.

G 1 2 13 14 15 T/A C 1

## X. FACILITY'S EPA I.D. NO.

F 16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

## XI. FACILITY ADDRESS

## XII. TRANSPORTATION SERVICES USED

## XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1		33 34 35 38 39 42		51 59 60	
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

## XIV. COMMENTS (enter information by section number—see instructions)

We do not expect our present or anticipated operations to generate other than small quantities of hazardous waste.



User Selection Criteria

Location: MICHIGAN	Evaluation Date Range From: 10/01/1991 To: 8/19/2003
Handler Name:	Only Evaluations with Violations: NO
Handler ID's: MID005357496	Federal facilities only: NO
Universe:	Reason Code:
Sort Order: Region, State, Handler Name	Display Code Description: YES

Results

Data meeting the criteria you selected follows.  
Total Pages: 4

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in the respective sections for evaluations and violations. Violation coverage areas are shown horizontally across the page in the evaluation data section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name:	CMECOMP.RDF
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date:	November 2002
Last Updated:	November 21, 2002
Contact:	rcrainfo.help@epa.gov



Allan Batka

02/27/03 11:03 AM

To: Cora Helm cc: Paul Little  
Subject: Self disclosure up-date

Cora,

The following is an up-date on the two self-disclosures assigned to me:

Curtis Paper, Inc  
Port Huron, MI.  
ORC Attorney: Jeffrey Cahn (6-6670)  
Multimedia disclosure with minor RCRA violations.  
No further information.

Yusa Corporation  
Washington Courthouse, OH.  
ORC Attorney: Peter Felitti (6-5114)  
5/31/02 - received past state enforcement information from OEPA as requested.  
7/3/02 - conference call with Yusa requesting additional information. USEPA follow-up with letter.  
8/2/02 - Yusa submitted additional information requested by USEPA.  
8/20/02 - Yusa submitted additional information requested by USEPA  
9/11/02 - Memo from USEPA (J. Kleiman) RE: delisting of waste involved in disclosure by Yusa.  
11/7/02 - Letter from USEPA informing Yusa that self-disclosure policy does not apply to alleged violations.

Cora, with the 11/7/02 letter to Yusa from USEPA, the Yusa disclosure is closed.






**Thomas Bramscher**

09/24/02 09:07 AM

To: Allan Batka/R5/USEPA/US@EPA

cc:

Subject: Re: Curtis Paper Inc. Self Disclosure 

Allan, I'm not sure we have seen the self disclosure as yet. If we get it, Carol Staniec will probably at least be the water contact.  
Allan Batka

**Allan Batka**

09/24/02 08:47 AM

To: Thomas Bramscher/R5/USEPA/US@EPA, Linda  
Hamsing/R5/USEPA/US@EPA

cc:

Subject: Curtis Paper Inc. Self Disclosure

I received a self disclosure from Jodi Swanson for Curtis Paper in Port Huron, MI. It has numerous Water and Air violations, only one minor RCRA violation. I was wondering who the Air and Water assignee's are and if there has been an attorney assigned to this matter.

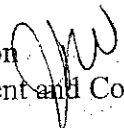
AB  
3-7316





## **MEMORANDUM**

SUBJECT: Self-Disclosure Notification

FROM: Jodi Swanson-Wilson   
Office of Enforcement and Compliance Assurance

TO: Anthony Restaino  
George Czerniak  
Joseph Boyle  
Jose Cisneros

DATE: September 5, 2002

The Office of Enforcement and Compliance and Assurance is in receipt of a Self Disclosure from *Curtis Papers, Inc.* I have included the original letter for your records. Please notify me upon assignment of a Program Contact Person and of the ORC attorney assigned. I will forward all future information that we receive regarding this case directly to the assigned Program Contact.

**NOTE:** Based on the fact that this is a multimedia disclosure, I will submit the Attorney Assignment Request form.





# KEATING, MUETHING & KLEKAMP, P.L.L.

ATTORNEYS AT LAW

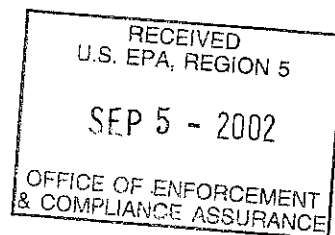
1400 PROVIDENT TOWER • ONE EAST FOURTH STREET • CINCINNATI, OHIO 45202  
TEL. (513) 579-6400 • FAX (513) 579-6457 • [www.kmklaw.com](http://www.kmklaw.com)

Brian M. Babb  
Direct Dial: (513) 579-6963  
Facsimile: (513) 579-6457  
E-Mail: [BBabb@kmklaw.com](mailto:BBabb@kmklaw.com)

August 30, 2002

## Via Federal Express

Ms. Tinka Hyde, Regional Team Manager  
Office of Enforcement and Compliance Assurance  
United States Environmental Protection Agency  
Region V E-19J  
77 West Jackson Boulevard  
Chicago, Illinois 60604



Mr. Oladipo Oyinsan  
Multi-Media Coordinator  
Michigan Department of Environmental Quality  
Southeast Michigan District Office  
38980 Seven Mile Road  
Livonia, Michigan 48152-1006

RE: Curtis Papers, Inc. - Voluntary Disclosure of Noncompliance at Port  
Huron, Michigan Mill

Dear Ms. Hyde and Mr. Oyinsan:

On behalf of Curtis Papers, Inc., dba Curtis Specialty Papers, ("Curtis Papers"), the purpose of this letter is to promptly and voluntarily self-disclose Curtis Papers' noncompliance or potential noncompliance with various federal, state and local environmental laws and regulations, concerning a paper manufacturing plant owned and operated by Curtis Papers, located at 218 Riverview Street, Port Huron, Michigan 48060 (the "Mill").

This self-disclosure is being made under the United States Environmental Protection Agency's ("U.S. EPA") Self Disclosure Policy (Incentives for Self Policing: Discovery, Disclosure, Correction and Prevention of Violations), and the Michigan Environmental Audit Privilege and Immunity Law (Section 14801 et seq. of Part 148 of the Natural Resources and Environmental Protection Act, PA 451 of 1994). This self-disclosure pertains to noncompliance and potential noncompliance under the federal Clean Air Act ("CAA"), Federal Water Pollution Control Act ("FWPCA"), the federal Resource Conservation and Recovery Act ("RCRA"), the federal Emergency Planning and Community Right to Know Act ("EPCRA"), the federal Hazardous Waste Transportation Act ("HMTA"), and analogous Michigan and local laws, and the rules adopted thereunder, concerning the Company's Port Huron Mill. This noncompliance was discovered through the performance of a recent environmental audit, the extent of



August 30, 2002

Page 2

noncompliance which may not yet have been fully identified, which audit is in the process of being completed.

The purpose of this letter also serves to document compliance with the disclosure requirements under U.S. EPA's Self Disclosure Policy and the Michigan Audit Law, and to avoid penalties as provided thereunder. Nothing in this self disclosure should be construed as or is intended to constitute a waiver of any privilege that may exist concerning this environmental audit.

The Mill was acquired by Curtis Papers on March 1, 2001 through a bankruptcy proceeding. The Company also is proceeding with environmental compliance audits of its Milford, New Jersey and Adams, Massachusetts facilities.

This noncompliance self-disclosure is being made as the result of the performance an environmental audit at the Mill that has not yet been completed. Noncompliance or potential noncompliance matters identified so far at this Mill, pertain to calendar years 2001 and 2002, and include the failure to:

1. update and recertify Spill Prevention, Control and Countermeasures Plan and conduct annual refresher training, and to comply with associated regulatory requirements, as is required under the FWPCA, state and local laws, and the regulations adopted thereunder;
2. monitor and record opacity of visible emissions associated with paper machines to verify compliance with opacity limits under Air Permit No. 113-97, and to comply with associated regulatory requirements, as is required under the CAA, state and local laws, and the regulations adopted thereunder;
3. update and implement a Stormwater Pollution Prevention Plan, and to comply with associated regulatory requirements, as is required under the FWPCA, state and local laws, and the regulations adopted thereunder;
4. comply with hazardous waste generator labeling requirements in satellite hazardous waste accumulation areas and perform and document waste evaluations, and to comply with associated regulatory requirements, as is required under the RCRA, state and local laws, and the regulations adopted thereunder;
5. comply with DOT registration requirements, provide DOT training, comply with DOT hazardous material handling requirements, and to comply with associated regulatory requirements, as is required under the HWTA, state and local laws, and the regulations adopted thereunder;



6. verify compliance with HAP limits as set forth under Air Permit No 113-97, and associated regulatory requirements, as is required under the CAA, state and local laws, and the regulations adopted thereunder;
7. maintain records for HAP containing materials as set forth under Air Permit No. 113-97 and associated regulatory requirements, as is required under the CAA, state and local laws, and the regulations adopted thereunder;
8. monitor and record opacity of visible emissions of boilers to verify compliance with opacity limits as set forth under Air Permit No. 514-95, and associated regulatory requirements, as is required under the CAA, state and local laws, and the regulations adopted thereunder;
9. transfer and modify Industrial User Permit PH-004 to reflect change in ownership, as is required under the FWPCA, state and local laws, and the regulations adopted thereunder;
10. provide secondary containment for chemical storage, as is required under the FWPCA, state and local laws, and the regulations adopted thereunder;
11. obtain approval to discharge lab wastewater to municipal sewer, as is required under the FWPCA, state and local laws, and the regulations adopted thereunder;
12. conduct annual reviews of Stormwater Pollution Prevention Plan, as is required under NPDES Permit No. MI0003450, the FWPCA, state and local laws, and the regulations adopted thereunder;
13. conduct and document monthly and semi-annual inspections and provide training in accordance with the Stormwater Pollution Prevention Plan, and NPDES Permit No. MI0003450, as is required under the FWPCA, state and local laws, and the regulations adopted thereunder;
14. identify caustic soda solution as a significant material in the Stormwater Pollution Prevention Plan, as is required under the FWPCA, state and local laws, and the regulations adopted thereunder;
15. timely submit Tier II and Form R reports, as is required under the EPCRA, state and local laws, and the regulations adopted thereunder;
16. properly monitor chlorine residual in wastewater discharges, as is required under NPDES Permit No. MI0003450, and the FWPCA, state and local laws, and the regulations adopted thereunder; and
17. file Michigan 2001 Industrial/Manufacturing Water Use Report.





This voluntary self-disclosure is being made as the result of the performance of an environmental audit by a reputable, independent environmental consultant (Webco Environmental Management, Inc.), which is in the process of being completed. The consultant was engaged to do the audit on July 16, 2002, visited the site on July 18-19, 2002, and, after reviewing various facility documents, permits, and regulatory requirements, provided a draft audit summary to the Company on August 13, 2002. This disclosure to the U.S. EPA and the Michigan Department of Environmental Quality is being made promptly upon discovery during this audit of violations or potential violations at the Company's Mill. Curtis Papers is making a reasonable, good faith effort to achieve compliance as quickly as practicable with these requirements. In this regard, unless stated otherwise, within sixty days Curtis Papers intends:

1. to update and recertify Spill Prevention, Control and Countermeasures Plan;
2. monitor and record visible emissions associated with paper machines and boiler to verify compliance with opacity limits;
3. update and implement Stormwater Pollution Prevention Plan;
4. label containers of hazardous waste in satellite accumulation areas and undertake and document waste evaluations;
5. submit DOT registration and provide DOT training;
6. comply with HAP limits;
7. maintain records for HAP containing materials;
8. submit modification of Industrial User Permit PH-004;
9. comply with secondary containment requirements for chemical storage areas;
10. obtain approval for discharge of lab wastewater to municipal sewer;
11. conduct annual review and document monthly and semi-annual inspections and provide training regarding Stormwater Pollution Prevention Plan;
12. revise Stormwater Pollution Prevention Plan to include all significant materials;
13. submit Tier II and Form R reports;
14. update monitoring methods for chlorine residual; and
15. submit Michigan 2001 Industrial/Manufacturing Water Use Report.



August 30, 2002

Page 5

This disclosure was not required by law, prior litigation or an order of a court or governmental agency. Curtis Papers has not committed a pattern of continuous or repeated violations of environmental laws, environmentally, related-settlement agreements or associated judicial or administrative orders, that arose from separate or distinct events, and it does not know or have reason to know that the U.S. EPA, the Michigan DEP, or another agency has commenced an investigation or enforcement action concerning its failure to comply with the requirements under EPCRA, RCRA, FWPCA, CAA, HWTA, analogous state laws, and the rules adopted thereunder, for the matters that have herein been disclosed. The noncompliance which has occurred, or may have occurred, has not resulted in serious harm or in the imminent and substantial endangerment to human health or the environment and has not resulted in significant economic benefit to the Company.

This disclosure is being made by:

Curtis Papers, Inc.  
218 Riverview Street  
Port Huron, Michigan 48060  
810-985-3153 - Telephone  
810-984-5520 - Facsimile  
Contact: Ronald G. Koglin

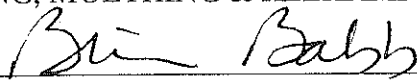
Further information concerning this disclosure may be obtained from:

Brian M. Babb, Esq.  
Keating, Muething & Klekamp, P.L.L.  
1400 Provident Tower  
One East Fourth Street  
Cincinnati, Ohio 45202  
513-579-6963 - Telephone  
513-579-6457 - Facsimile

Please contact me should you have additional questions or need more information concerning this disclosure.

Very truly yours,

KEATING, MUETHING & KLEKAMP, P.L.L.

BY:   
Brian M. Babb

cc: Mr. Ronald G. Koglin



**CROWN PAPER CO**

**PORT HURON**

**MID005357496**

Select the Enforcement to process or choose the Add New Enforcement button below:

Your search has found 3 Enforcements.

Enforcements							Violations						
Act Loc	Seq #	Type	Date	Agency	Resp Person	Enforcement Desc	Determined Date	Seq #	Type	Resp Agency	Class Priority	Latest Sched RTC	Actual RTC
MI	001	<u>120</u>	2/27/2002	S		WRITTEN INFORMAL	2/25/2002	0002	GGR	S	1 -	3/27/2002	3/27/2002
MI	001	<u>120</u>	10/3/1985	S		WRITTEN INFORMAL	8/16/1985	0001	GER	S	1 -	10/18/1985	3/7/1986
MI	002	<u>120</u>	8/23/1985	S		WRITTEN INFORMAL	8/16/1985	0001	GER	S	1 -	10/18/1985	3/7/1986

Go To

URL: CME\_enf\_main.asp



## Description of codes used on the report:

Universes	Description Of Universes
Operating tsdf	Indicates that the facility is a treatment, storage or land disposal facility subject to any type of enforcement. Then specifies type facility (see LIBST below for further explanation).
PCWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Post-Closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
ClosWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
Perm/PC	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permitting/Closure/Post-Closure Progress universe. It is then specifies type of facility (see LIBST below for further explanation).
PermWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permit Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
SubjCA	Indicates that the facility is subject to Corrective Action. ('X' indicates that the facility is in this universe).
CAWrkld	Indicates that the facility is part of the Corrective Action Workload universe. ('X' indicates that the facility is in this universe).
LQG	Indicates that the facility is a Large Quantity Generator. ('X' indicates that the facility is in this universe).
SQG	Indicates that the facility is a Small Quantity Generator. ('X' indicates that the facility is in this universe).
CESQG	Indicates that the facility is a Conditionally Exempt Small Quantity Generator. ('X' indicates that the facility is in this universe). Note: CESQG are not nationally required to notify or obtain an EPA ID. Therefore, the absence of CESQG data for any given state or facility does not indicate a data quality problem.
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ('X' indicates that the facility is in this universe).
SNC	Indicates that the facility is a Significant Non-Complier. ('X' indicates that the facility is in this universe).
BOYSNC	Indicates that the facility was a Significant Non-Complier at the beginning of the fiscal year: Oct 1- Sep 30. ('X' indicates that the facility is in this universe).
<b>LIBST in the above universes indicates:</b>	
L	Land Disposal facility
I	Facility is an Incinerator
B	Facility is a Boiler or Industrial Furnace (BIF)
S	Storage facility
T	Treatment facility

### ACT LOC

Act Loc indicates the activity location where the evaluation/inspection was performed, the violation was discovered or the enforcement action was taken.





STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
STEPHEN V. MONSMA  
STEWART MYERS  
J.D. OLSON  
RAYMOND POUPORE  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

March 7, 1986

Dunn Paper Company  
218 Riverview Street  
P.O. Box 227  
Port Huron, MI 48060  
Attn: Robert Ferguson  
Director of Safety

RE: MID 005357496

Dear Mr. Ferguson:

This letter is to acknowledge receipt of your letter dated February 28, 1986, indicating your compliance program for RCRA deficiencies cited during my inspection on August 16, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, appearing to read "Faye Dade".

Faye Dade  
HAZARDOUS WASTE DIVISION

FD:jg

cc: U.S. EPA, Region V  
B. Okwumabua



Dunn Paper Company  
218 Riverview Street  
P. O. Box 227  
Port Huron, Michigan 48060  
Telephone (313) 984-5523

Copy to: R. E. Hubbard  
A. H. Hupp  
T. E. Gallagher  
J. R. Scohy  
P. R. Hoppe  
J. E. Ramsey  
W. C. Bixler  
R. G. Koglin

RECEIVED  
MAR 03 1986  
HAZARDOUS WASTE DIV.

February 28, 1985

Ms. Faye Dade  
Michigan Department of  
Natural Resources  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

RE: Dunn Paper letter dated October 30, 1985, RCRA compliance and  
contingency planning programs items III and IV and our  
discussion of February 6, 1986.

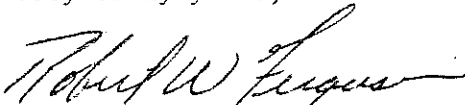
Dear Faye,

We are submitting our Contingency Plan pending your approval. Per our  
discussion of February 24, 1986, the additional copies to other agencies  
will be mailed registered mail and proof of receipt will be mailed to  
you. We are prepared to train our employees upon your acceptance of  
this plan.

We hope that this plan will fulfill our obligations which were identi-  
fied during the RCRA compliance and inspection conducted August 16, 1985.

If you have any questions regarding this plan or further suggestions,  
please contact me at (313) 984-5521, Extension 291.

Very truly yours,

  
Robert W. Ferguson  
Director of Safety

RWF/cmb





STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
STEPHEN V. MONSMA  
STEWART MYERS  
J. VID D. OLSON  
RAYMOND POUPORE  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

December 30, 1985

Dunn Paper Company  
218 Riverview Street  
Port Huron, Michigan 48060  
Attn: Robert W. Ferguson  
Director of Safety

Re: MID 005357496

Dear Mr. Ferguson:

This letter is to acknowledge receipt of your letter dated December 15, 1985, indicating your compliance program for RCRA deficiencies cited during the inspection on August 16, 1985, conducted by Ken Damrel.

As you have indicated, records of personnel training and contingency plans will be submitted to our office by January 1, 1986.

If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, appearing to read "Faye Dade".

Faye Dade  
HAZARDOUS WASTE DIVISION

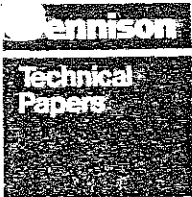
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cc: U.S. EPA, Region V  
B. Okwumabua



Dunn Paper Company  
218 Riverview Street  
P. O. Box 227  
Port Huron, Michigan 48060  
Telephone (313) 984-5523

Copy to: R. E. Hubbard  
A. H. Hupp  
T. E. Gallagher  
J. R. Scohy  
P. R. Hoppe  
J. E. Ramsey  
W. C. Bixler  
R. G. Koglin



December 15, 1985

DEC 16 1985

Mr. Kenneth Damrel  
Michigan Department of  
Natural Resources  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

RE: Dunn Paper Company letter dated November 8, 1985, RCRA Compliance  
and contingency planning programs item II.

Dear Mr. Damrel,

Regarding the program structure outlined in our reference letter of  
October 30, 1985, we have identified those employees who would deal  
with materials in potential hazardous waste situations. They are  
as follows:

- A. Contaminated Fuels:  
Maintenance Supervisor on duty
- B. Contaminated Caustic Solutions in bulk storage:  
Special Projects Supervisor on duty
- C. Contaminated Compounds in Drum Storage:  
Yard Supervisor on duty
- D. Contaminated Corrosives, Acidic Solutions:  
Manufacturing Superintendent on duty
- E. Other Contaminated Compounds:  
Manufacturing Superintendent on duty



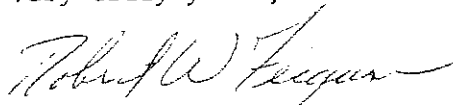


Mr. Kenneth Damrel  
December 15, 1985  
Page 2

Should the situation warrant, these supervisors will alert the emergency coordinator.

We expect to respond to you as outlined in Item III by January 1, 1986.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Robert W. Ferguson", with a long horizontal flourish extending to the right.

Robert W. Ferguson  
Director of Safety

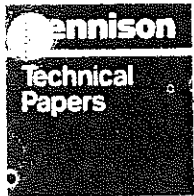
RWF/cmb



Dunn Paper Company  
218 Riverview Street  
P.O. Box 227  
Port Huron, Michigan 48060  
Telephone (313) 984-5523

Michigan 357 492  
The copy designation: ADMIN--  
Govt Regs - EPA/RCRA Compliance  
Inspections

Copy to: R. E. Hubbard  
A. H. Hupp  
T. E. Gallagher  
J. R. Scohy  
P. R. Hoppe  
J. E. Ramsey  
W. C. Bixler  
R. G. Koglin



November 8, 1985

Mr. Kenneth Damrel  
Michigan Department of  
Natural Resources  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

RE: Dunn Paper Company letter dated October 30, 1985, RCRA compliance  
and contingency planning programs item I.

Dear Mr. Damrel,

Regarding the program structure outlined in our reference letter above;  
we have identified the following potential hazardous waste situations:

- A. Contaminated Fuels (water, dirt, etc. from punctures or other tank failure)
  1. Fuel oil 250 gallon above ground tank
  2. Kerosene 600 gallon underground tank
  3. Gasoline 3000 gal underground tank
- B. Contaminated Caustic Solutions (water, oils, dirt, etc.)
  1. Bulk Storage
    - a. Bulk storage tank 7000 gallon above ground with containment area.
    - b. Two caustic dilution tanks 1000 gallons each, with containment area.
  2. Drum Storage (spilled, punctured, dirt, etc.)
    - a. Caustic soda
    - b. Alkaline cleaning compounds
    - c. Ammonium Hydroxide
  3. Contaminated corrosives, Acidic solutions, Drum/Carboy Storage/bulk (spilled, punctured, dirt, etc.):
    - a. Hydrochloric Acid
    - b. Sulfuric Acid
    - c. Formic Acid
    - d. Alum



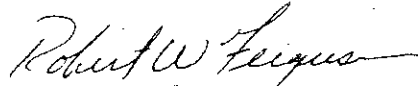
Mr. Kenneth Damrel  
November 8, 1985  
Page 2

D. Other Contaminated Compounds (due to spills, punctures, etc.)

1. Quilon
2. I,I,I,-Trichlorethane

We are proceeding to identify those employees who would deal with these or other materials in potential hazardous waste situations. We expect to respond to you as outlined in Item 2 by December 15, 1985.

Very truly yours,

  
Robert W. Ferguson  
Director of Safety

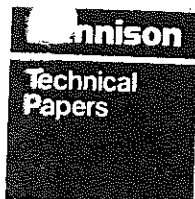
RWF/cmb

RECEIVED  
NOV 19 1985  
U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
HAZARDOUS WASTE ENFORCEMENT BRANCH



Dunn Paper Company  
218 Riverview Street  
P.O. Box 227  
Port Huron, Michigan 48060  
Telephone (313) 984-5523

M18 105-337 49  
HWEB  
357



October 30, 1985

RECEIVED  
NOV 13 1985  
SOLID WASTE BRANCH  
U.S. EPA, REGION V

Mr. Kenneth Damrel  
Michigan Department of  
Natural Resources  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

RE: DNR letter dated October 3, 1985, and Dunn Paper Company  
letter dated October 18, 1985, whose subjects were your  
RCRA inspection conducted August 16, 1985

Dear Mr. Damrel:

To correct the deficiencies cited, the President of Dunn Paper Company  
has named a committee to implement the necessary training and contin-  
gency planning programs. Its members are:

ROBERT W. FERGUSON, who will direct the hazardous waste  
management program. Mr. Ferguson is currently in charge  
of our company safety programs, including compliance with  
OSHA and other regulations relating to the workplace en-  
vironment. Employee training programs are also his respon-  
sibility. Our Corporate Environmental Department is sup-  
porting his hazardous waste management activities.

RONALD G. KOGLIN, who is currently Technical Supervisor.  
Mr. Koglin is a chemist, knowledgeable in the proper  
handling of all of the chemicals and raw materials used  
at the mill. Through continuing education he has become  
well trained regarding RCRA's requirements for the  
management, control and disposition of hazardous waste.

WILLIAM C. BIXLER, who is currently a line supervisor and  
Chief of our Mill Fire Brigade. Mr. Bixler will act as  
Emergency Coordinator. His background, training and posi-  
tion are well suited for the position of Emergency Coordi-  
nator. Practical experience as a fireman is supplemented  
with frequent attendance at classroom and field training  
exercises directed at response to emergencies. Recent  
classes have covered the handling of chemical spills, ex-  
plosions, chemical fires and other emergencies which might  
be encountered in hazardous waste management.

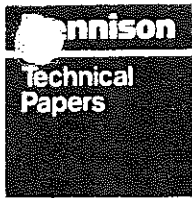




Dunn Paper Company  
218 Riverview Street  
P.O. Box 227  
Port Huron, Michigan 48060  
Telephone (313) 984-5523

File copy designation:

ADMIN--Govt Regs - EPA/RCRA  
Compliance Inspections



October 18, 1985

RECEIVED

OCT 24 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

Mr. Kenneth Damrel  
Michigan Department of  
Natural Resources  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

Copy to: R. E. Hubbard  
A. H. Hupp  
T. E. Gallagher  
J. R. Scohy  
P. R. Hoppe

Dear Mr. Damrel:

In reply to your letter dated October 3, 1985, received October 15, 1985, which requires our response by October 18, 1985, we are proceeding to establish the requested training program and contingency plan. We have appointed a Director of Hazardous Waste Management and a supporting task force consisting of manufacturing, safety and technical personnel.

Some time will, of course, be required to develop the regulatory training program and contingency planning. As an example, job descriptions must be written. We will respond to you by November 1, 1985, with a reasonable timetable for implementation of the various components of the training and contingency planning regulations.

Very truly yours,

*Ronald G. Koglin*  
Ronald G. Koglin,  
Technical Supervisor

RGK:jrp

Copy: Region "V" Administrator, ✓  
Chicago, IL



STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
E. R. CAROLLO  
JACOB A. HOEFER  
EPHEN F. MONSMA  
MARY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

October 3, 1985

Dunn Paper Company  
218 Riverview Street  
Port Uron, MI 48060  
Attn: Ronald Koglin, Technical Supervisor

RE: MID 005357496

Dear Mr. Koglin:

This letter is to acknowledge receipt of your letter dated September 19, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on August 16, 1985.

Your response is not acceptable and I still feel that you are regulated under RCRA as a generator. Therefore, I am requesting that you develop a training program and contingency plan as requested in my letter of August 23, 1985.

You are requested to respond to this letter by October 18, 1985. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Ken Damrel  
Environmental Engineer  
HAZARDOUS WASTE DIVISION

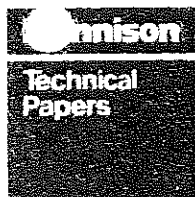
cc: U.S. EPA, Region V  
B. Okwumabua



Dunn Paper Company  
218 Riverview Street  
P.O. Box 227  
Port Huron, Michigan 48060  
Telephone (313) 984-5523

SEP 23 1985

HAZARDOUS WASTE



September 19, 1985

Mr. Kenneth L. Damrel,  
Environmental Engineer  
Hazardous Waste Division  
S.E. Michigan Field Office  
Department of Natural Resources  
15500 Sheldon Road  
Northville, MI 48167

Dear Mr. Damrel:

During your August 16, 1985, inspection, we discussed infrequent shipments of hazardous wastes exceeding the 1,000 kg monthly exclusion limit for small quantity generators. Similar situations were considered during inspections conducted on August 9, 1982, and January 9, 1984. Since we now, as then, have only occasional encounters with more than 1,000 kg of hazardous wastes we assumed that we were not subject to the regulations noted in your letter of August 23, 1985.

Although we use common chemicals in our manufacturing process, we do not routinely generate a hazardous waste stream. Disposal of a hazardous waste product is required occasionally. Since these waste products are the result of an accidental spill or perhaps an obsolete material, we cannot predict where or when we might have such an occurrence.

In the event of an accidental spill of any chemical, our employees are required to report the incident to their supervisor immediately. All spills are handled as "hazardous" until a determination is made by line supervision. Line supervision is informed in the proper methods of handling all raw materials. In the event of a spill of material defined as a hazardous waste, immediate containment is implemented.

#### PERSONNEL TRAINING:

New employees begin their training with an orientation program. Each employee is advised of chemical handling hazards he will encounter and the protective measures and equipment which must be used to ensure his safety. As the employee joins the work force he is given the on the job training required to handle each material and perform each job safely.



Mr. Kenneth L. Damrel,  
Department of Natural Resources  
September 19, 1985

Page 2

On the job training is also provided each time there is a change in job assignment. When warranted by the hazard potential of a particular assignment, additional training is provided. As examples we have significant training and qualification requirements for those individuals who work with our chlorine and bulk caustic soda systems. Each of these positions has minimum health and education requirements. Considerable training is also provided in the use of respirators, self-contained breathing apparatus and protective clothing. A copy of the job qualifications and a job safety analysis for these positions is attached. Trained workers are available, in the unusual situation when one of our raw materials may become a hazardous waste.

We have an extensive response program for on site emergencies. An annunciator system will alert our employees of any potential danger. Our Fire Brigade and State Licensed Emergency Medical Technician Squads are well equipped and well trained. I have attached our emergency response procedures for these groups. Our EMT's and Fire Brigade members frequently attend formal classes to maintain and improve their skills. Both of these groups have received community commendations for their fire fighting and medical emergency programs. These people, wherever they are in the mill, will respond when there is a fire or medical emergency. Portable fire extinguishers and fire hoses are located throughout the facility. Recently, we installed a fire pond with a minimum of 500,000 gallons of water available for fire fighting. This will supplement the 125,000 gallons available in our water tower. Our Fire Brigade maintains their equipment in a high state of readiness and is well trained in the use of all the fire fighting equipment and resources available at our facility.

#### CONTINGENCY PLANNING:

We have taken many steps to minimize the hazards which might result from the operation of our facility. Our Fire Brigade and Emergency Medical Technicians are well trained and well equipped to deal with any fire or medical emergency which we might encounter in the area of hazardous waste management.

Dunn's Fire Chief, who is also an active member of our company safety committee, and a senior member of our EMT group, recently attended a three day seminar sponsored by Marathon Oil Company, covering the handling of hazardous chemicals and emergency response procedures. The training acquired allows us to keep abreast of the latest technology in handling potentially hazardous materials. Transmitting skills such as these is an integral part of our ongoing training effort. The skills he





Mr. Kenneth L. Damrel,  
Department of Natural Resources  
September 19, 1985

Page 3

has acquired will be passed on to other line supervisors, our Fire Brigade and EMT emergency response groups, the safety committee and our rank and file employees.

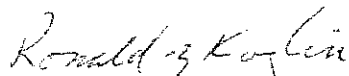
Our bulk caustic soda and drum chemical storage facilities are located inside containment structures. If a raw material enters a containment area, we have established procedures to handle the material safely. Depending upon the situation, we may employ the services of a professional waste disposal company and vacuum truck. In this situation we would discontinue operations requiring use of the contained facility and keep people from entering the area. The disposal company provides the trained personnel and equipment required. When the quantity is small, our own properly outfitted and trained personnel will put the material into drums. These drums are properly handled and labeled before shipment.

We maintain routine contact with the City of Port Huron Fire Department. During the week of September 3, 1985, firemen from our city department toured our facility to familiarize themselves with our operations, the location of driveways, building entrances and exits and the location of potentially hazardous materials. More than sixty fire fighters participated. We also maintain continuing contact with Port Huron Hospital. They provide transportation and care which may be needed during a medical emergency. Procedures have also been established for medical emergencies.

We are somewhat concerned that we could be considered in violation of some aspects of the Resource Conservation and Recovery Act (RCRA). We are hopeful that this response will eliminate any possible misunderstandings regarding our activities and the level of training and contingency planning practiced at Dunn Paper Company.

If you have any further questions regarding our activities, we would appreciate any constructive comments you may have.

Very truly yours,



Ronald G. Koglin,  
Technical Supervisor

RGK:jrp

Copy: U.S. EPA, Region V,  
Chicago, IL



STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
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ARY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

August 23, 1985

Dunn Paper Comany  
218 Riverview Street  
Port Huron, MI 48060  
Attn: Ronald Koglin, Technical Supervisor

RE: MID 005357496

Dear Mr. Koglin:

On August 16, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at the above address to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of Subtitle C of RCRA. Specifically, the following was found:

1. The facility does not have a personnel training program, nor records of training as required by 40 CFR §265.16.
2. The facility does not have a contingency plan, nor emergency procedures as required by 40 CFR 265 Subpart D.

You are requested to respond to this letter by September 16, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

*Kenneth L. Damrel*

Kenneth L. Damrel  
Environmental Engineer  
HAZARDOUS WASTE DIVISION

KD:jg

cc: U.S. EPA, Region V  
B. Okwumabua



# RCRA Inspection Report

EPA Identification Number: M I D 005357496

Installation Name: Dunn Paper Co.

Location Address: 218 Riverview St.

City: Port Huron State: MI 48060

Date of inspection: 8-16-85 Time of inspection (from) 1:15 (to) 2:15

Person(s) interviewed

Ronald Koglin

Title

Technical Supervisor

Telephone

313-984-5521

Inspector(s)

Kenneth L. Damrel

Agency/Title

MDNR/HWD/Env. Eng.

Telephone

313-459-9180

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☒ Generation only

B

☐ Transportation only

C



# INSPECTION FORM B

## Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

## Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	3			11
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID number of transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment.				0
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				0





Section C - PRE-TRANSPORT REQUIREMENTS  
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>No containers onsite at present</u>
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>"</u>
(3) If required, are placards available to transporter? 262.33	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>Rely on transporter</u>
* (4) Pre-shipment Accumulation:				
* applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<u>  ✓  </u>	<u>      </u>	<u>      </u>	
i. Is each container clearly marked with the date on which the period of accumulation began?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>No containers onsite at present</u>
ii. Have more than 90 days elapsed since the dates marked?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	<u>      </u>	<u>      </u>	<u>  ✓  </u>	
iv. Are containers in good condition?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	
v. Are containers compatible with waste in them?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	
vi. Are containers managed to prevent leaks?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	
vii. Are containers stored closed?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	
viii. Are containers inspected weekly for leaks and defects?	<u>  ✓  </u>	<u>      </u>	<u>      </u>	
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>None on site at present</u>



	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			✓	
b. Is hazardous waste accumulated in tanks? If no, skip to c. 265.34 (January 11, 1982 revision)			✓	
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 265.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				



Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

\_\_\_\_\_ ☒ \_\_\_\_\_

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

- i. Job Titles?  
ii. Job Descriptions?  
iii. Description of training?  
iv. Records of training?  
v. Did personnel receive the required training by 5-19-81?  
vi. Do new personnel receive required training within six months?  
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

\_\_\_\_\_ ☒ \_\_\_\_\_ no training program  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ ☒ \_\_\_\_\_

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 264.31

\_\_\_\_\_ ☒ \_\_\_\_\_



	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 264.32				
Internal communications or alarm systems?	✓			
Telephone or 2-way Radios at the scene of operations?	✓			
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

150 portable extinguishers

iii. Testing and Maintenance of Emergency Equipment: 264.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
Is emergency equipment maintained in operable condition?	✓			
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	✓			
v. Is there adequate aisle space for unobstructed movement?			✓	No containers onsite
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			Fire dept.

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52		✓		No Contingency plan
--	--	---	--	---------------------





	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
vii. Is the facility emergency coordinator identified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	Yes	No	NI	Remarks
(1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<u>✓</u>	<u>      </u>	<u>      </u>	<u>Relying on Safety Data Sheets</u>

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)  
262.50

(1) Has the installation imported or exported hazardous waste? If "no", skip a and b.	<u>      </u>	<u>✓</u>	<u>      </u>	<u>      </u>
a. Exporting Hazardous Waste, has a generator:				
i. Notified the Administrator in writing?	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
iii. Met the Manifest requirements?	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Importing Hazardous Waste, has the generator met the manifest requirements?	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
C. H. CAROLLO  
JACOB A. HOEFER  
PHEN F. MONSMA  
JERRY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELY

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

RONALD O. SKOOG, Director

January 9, 1984

Hazardous Waste Division  
1120 W. State Fair Ave.  
Detroit, MI 48203

Mr. Ronald Koglin, Technical Supervisor  
Dunn Paper Company  
218 Riverview Street  
Port Huron, MI 48060

EPA ID No: MID 005357496

Attention: Ronald Koglin

Dear Mr. Koglin:

On January 5, 1984 I conducted an investigation of your facility located at 218 Riverview Street, Port Huron, MI to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation Recovery Act (RCRA) as amended.

During my investigation it was determined that you presently meet the requirements of 40 CFR 261.5; Special Requirements for hazardous waste generated by small quantity generators.

Please be advised that you must insure your waste is handled in accordance with 40 CFR 261.5(g). Also, be advised that if your facility, at any time, generates a quantity of hazardous waste which exceeds the applicable exclusion level specified in 261.5 in any one calendar month, you are then subject to regulation under Parts 262 through 265 and Parts 122 and 124 of Chapter I and the notification requirements of Section 3010 of RCRA during that month. It is advised that you take all appropriate measures to assure that you do not accumulate, at any time, more than a total of 1000 kilograms of your hazardous waste or acutely hazardous in quantities greater than set forth in 40 CFR 261.5(e) 1 or (e) 2 in order to continue to qualify for this exclusion.

If you have any questions and/or concerns regarding hazardous waste management, please feel free to contact me at (313) 368-3335.

Sincerely,  
HAZARDOUS WASTE DIVISION

Larry AuBuchon  
DETROIT DISTRICT OFFICE

LA:pf

cc: K. Burda  
J. Bohunsky  
U.S. EPA



RCRA Inspection Report

EPA Identification Number: M I D 005357496

Installation Name: Dunn Paper Company

Location Address: 218 River view St

City: Port Huron State: MI 48060

Date of inspection: 1/5/84 Time of inspection (from) 1315 (to) 1400

Person(s) interviewed	Title	Telephone
<u>Ronald Koglin</u>	<u>Tech Supervisor</u>	<u>(313) 984-5521</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>Larry A. Budron</u>	<u>MDNR - R I I W D / W Q S</u>	<u>(313) 368-3335</u>
_____	_____	_____

Installation Activity (mark only one box) Inspection Form(s)

- |  |      |
|--|------|
| <input type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A    |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation)                        | A    |
| <input type="checkbox"/> Generation and Transportation   | B, C |
| <input type="checkbox"/> Generation only   | B    |
| <input type="checkbox"/> Transportation only   | C    |

I believe this facility should continue to be considered a SQG. In the past year <sup>11/1/83</sup> 1000 gallons of waste caustic soda solution was generated from an accidental spill of 200 gallons of caustic soda solution (50%). The other infrequent shipments during the past year were very few in number & all small quantities. I will continue to monitor the company.

c: EPA  
K. Burda  
J. Bohunsky





STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

RONALD O. SKOOG, Director

January 9, 1984

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
R. CAROLLO  
JACOB A. HOEFER  
STEPHEN F. MONSMA  
HILARY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELEY

Hazardous Waste Division  
1120 W. State Fair Ave.  
Detroit, MI 48203

RECEIVED

JAN 10 1984

TECH. OPERS.

Mr. Ronald Koglin, Technical Supervisor  
Dunn Paper Company  
218 Riverview Street  
Port Huron, MI 48060

EPA ID No: MID 005357496

Attention: Ronald Koglin

Dear Mr. Koglin:

On January 5, 1984 I conducted an investigation of your facility located at 218 Riverview Street, Port Huron, MI to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation Recovery Act (RCRA) as amended.

During my investigation it was determined that you presently meet the requirements of 40 CFR 261.5; Special Requirements for hazardous waste generated by small quantity generators.

Please be advised that you must insure your waste is handled in accordance with 40 CFR 261.5(g). Also, be advised that if your facility, at any time, generates a quantity of hazardous waste which exceeds the applicable exclusion level specified in 261.5 in any one calendar month, you are then subject to regulation under Parts 262 through 265 and Parts 122 and 124 of Chapter I and the notification requirements of Section 3010 of RCRA during that month. It is advised that you take all appropriate measures to assure that you do not accumulate, at any time, more than a total of 1000 kilograms of your hazardous waste or acutely hazardous in quantities greater than set forth in 40 CFR 261.5(e) 1 or (e) 2 in order to continue to qualify for this exclusion.

If you have any questions and/or concerns regarding hazardous waste management, please feel free to contact me at (313) 368-3335.

Sincerely,  
HAZARDOUS WASTE DIVISION

*Larry AuBuchon*

Larry AuBuchon  
DETROIT DISTRICT OFFICE

LA:pf

cc: K. Burda  
J. Bohunsky  
U.S. EPA



TO Tour Foremen  
FROM M. L. Christopher

DATE 12/15/82  
CC:

SUBJECT Tour Foremen Chlorine Emergency Notification List

---

Upon notification of chlorine emergency by operator, operating personnel, or enunciator system.

- A. Determine if medical emergency; if so, notify EMT on duty.
- B. Determine if chlorine house door has been closed and fan turned off.
- C. Contact the following people in sequence until someone is reached and they will determine if outside help is required.
  1. Michal L. Christopher - Home Phone #984-2139, Beeper #50.
  2. Ronald G. Koglin - Home Phone #987-9638, Beeper #21
- D. Contact one of the following people in sequence until someone is reached. They will be needed as back-up while the severity of the problem is being determined.
  1. 7:00 a.m. to 3:00 p.m. shift chlorine system tender will be contacted first.
  2. The following personnel may then be contacted by departmental seniority:
    - (1) Tom Reckker
    - (2) Danny Beamer
    - (3) Steve DeLacy
    - (4) Al Greenia
    - (5) Roy Gould
    - (6) Tom Healy
    - (7) Tom Shank
    - (8) Greg Vincent
    - (9) James Kendrick



TO Operator  
FROM M.L. Christopher  
SUBJECT Chlorine Emergency Notification

DATE January 13, 1982  
CC:

---

I. Upon notification of chlorine emergency by operating personnel:

- A. Determine if medical emergency; if so contact  
Emergency Medical Technician on duty by pager.
- B. Notify tour foremen of emergency and any steps  
already taken.



TO Tour Foremen  
FROM M.L. Christopher

DATE January 13, 1982  
CC:

SUBJECT Tour Foremen Chlorine Emergency Notification List

---

- I. Upon notification of chlorine emergency by operator, operating personnel, or enunciator system.
  - A. Determine if medical emergency; if so notify EMT on duty.
  - B. Determine if chlorine house door has been closed and fan turned off.
  - C. Contact the following people in sequence until someone is reached and they will determine if outside help is required.
    1. Michal L. Christopher - Home Phone # 984-2139 Beeper # 50
    2. Jeff Wessel - Home Phone # 1-384-1841 Beeper # 54
    3. Ron Koglin - Home Phone 987-9638 Beeper # 21

MLC/bjk  
01/13/82







## AVOID VERBAL ORDERS

Date February 14 19 85 Time \_\_\_\_\_ A.M.  
P.M.  
To Carolyn Desjardins Dept. \_\_\_\_\_  
Subject Pulmonary Function Test

All employees that will be working in an area that requires the use of respirators or a self-contained breathing apparatus must have a pulmonary function examination. The examination consists of a chest x-ray and the pulmonary function test.

Any employee having other than normal results will be denied work privileges without a letter of approval from the company doctor.

RWF/ssh

STANDARD FORM 3164  
MATTICK BUSINESS FORMS, INC. - WHEELING, IL 60090

Signed T.W. Ferguson



STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER  
ARL T. JOHNSON  
E.M. LAITALA  
HILARY F. SNELL  
HARRY H. WHITELEY  
JOAN L. WOLFE  
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

Water Quality Division  
9311 Groh Road  
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

#1048

October 8, 1982

Mr. Ronald Koglin,  
Technical Supervisor  
Dunn Paper Company  
218 Riverview  
Port Huron, Michigan 48060

Dear Mr. Koglin:

On August 9, 1982, I visited your facility to conduct an inspection for compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended. Enclosed is a copy of my report for your use.

There was a generally good level of compliance. One sticky point, however, was your lack of training records, which are required by 262.34(a)5, adopting 265.16 by reference. Your direct supervision of employees handling hazardous waste may not be adequate protection in lieu of a training program for those employees. Should you again generate more than the small quantity exclusion level of hazardous waste, you are advised to provide training for all employees handling it.

Please feel free to contact this office or the office of hazardous waste management in Lansing should you have any questions concerning hazardous waste.

Sincerely,

WATER QUALITY DIVISION

RECEIVED

OCT 18 1982

ACT 61

Roy E. Schrameck, P.E.  
District Engineer

*Chuck Bikfalvy*

Chuck Bikfalvy  
Water Quality Specialist

RES:CB/sc

Enclosure

cc: Al Howard (2)  
files





# RCRA Inspection Report

EPA Identification Number: M I D 0 0 5 3 5 7 4 9 6

Installation Name: DUNN PAPER CO

Location Address: 218 RIVERVIEW

City: PORT HURON State: MICH , 48060

Date of inspection: 8/9/82 Time of inspection (from) 1:00 (to) \_\_\_\_\_

Person(s) interviewed

Title

Telephone

RONALD KOLLIN

TECH. SUPERVISOR

(313) 984-5521

Inspector(s)

Agency/Title

Telephone

C. BIRKBEALY

MDNR WATER QUAL  
SPEC.

(313) 675-0860

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or  
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☒ Generation and Transportation

B, C

☒ Generation only

B

☐ Transportation only

C

RECEIVED

1007 10 1982

1.07 63



# INSPECTION FORM B

## Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

## Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	LAST SHIPMENT 1/11/82
(3) Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements) 262.21	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID number of transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.				0
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				NA





Section C - PRE-TRANSPORT REQUIREMENTS  
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>			
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<input checked="" type="checkbox"/>			
(3) If required, are placards available to transporter? 262.33	<input checked="" type="checkbox"/>			
* (4) Pre-shipment Accumulation:				
** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<input checked="" type="checkbox"/>			
i. Is each container clearly marked with the date on which the period of accumulation began?			<input checked="" type="checkbox"/>	NO HAZARDOUS WASTES NOW ON SITE
ii. Have more than 90 days elapsed since the dates marked?			<input checked="" type="checkbox"/>	NA SEE REMARKS
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"			<input checked="" type="checkbox"/>	NA
iv. Are containers in good condition?			<input checked="" type="checkbox"/>	NA
v. Are containers compatible with waste in them?			<input checked="" type="checkbox"/>	NA
vi. Are containers managed to prevent leaks?			<input checked="" type="checkbox"/>	NA
vii. Are containers stored closed?			<input checked="" type="checkbox"/>	NA
viii. Are containers inspected weekly for leaks and defects?			<input checked="" type="checkbox"/>	NA
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).			<input checked="" type="checkbox"/>	NA



Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers? \_\_\_\_\_ ✓ \_\_\_\_\_

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

i. Job Titles? \_\_\_\_\_

ii. Job Descriptions? \_\_\_\_\_

iii. Description of training? \_\_\_\_\_

iv. Records of training? \_\_\_\_\_

v. Did personnel receive the required training by 5-19-81? \_\_\_\_\_

vi. Do new personnel receive required training within six months? \_\_\_\_\_

vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? \_\_\_\_\_

✓ MR. KOLLIN  
HAS SOLE  
RESPONSIBILITY  
FOR HAZARDOUS  
WASTE HANDLING  
AND SUPERVISES  
ACTIVITIES DIRECT  
HE FEELS THAT  
THIS PRECLUDES  
THE NEED FOR  
FORMALIZED  
TRAINING

- e. Preparedness and Prevention 265. Subpart C

i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 264.31 \_\_\_\_\_ ✓ \_\_\_\_\_



	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	NA
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			✓	NA
b. Is hazardous waste accumulated in tanks? If no, skip to c. 265.34 (January 11, 1982 revision)			✓	
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 265.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				



Yes No NI Remarks

ii. If required, does this facility have the following equipment: 264.32

Internal communications or alarm systems?

✓ \_\_\_\_\_ SIREN

Telephone or 2-way Radios at the scene of operations?

✓ \_\_\_\_\_ TELEPHONES

Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ \_\_\_\_\_

Indicate the volume of water and/or foam available for fire control:

CITY WATER AND 125,000 GALLON WATER TOWER

iii. Testing and Maintenance of Emergency Equipment: 264.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ \_\_\_\_\_ HAS OWN FIRE BRIGADE + EMT PERSONNEL

Is emergency equipment maintained in operable condition?

✓ \_\_\_\_\_

iv. Has owner/operator provided immediate access to internal alarms (if needed)?

✓ \_\_\_\_\_ VIA TELEPHONES

v. Is there adequate aisle space for unobstructed movement?

✓ \_\_\_\_\_

vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

✓ \_\_\_\_\_

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52

✓ \_\_\_\_\_  
 PIPP/SPCC PLAN WITH PROCEBU  
 & CALL LIST FOR CLEAN-UP FIRMS





	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓			DOES HAVE ARRANGEMENTS WITH CONTRACTORS, DOES NOT INCLUDE HOSPITALS, POLICE
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓			
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	✓			PART OF MEDICAL EMERGENCY PLAN
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	✓			AMBULANCE + FIRE DEPT. - ALL COPY OF MED EMERGENCY PLAN
vii. Is the facility emergency coordinator identified?	✓			
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?				✓ NA - NO EMERGENCIES



Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

☒ ☐ ☐ ☐

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)  
262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

☐ ☒ ☐ ☐

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

☐ ☐ ☐ ☐

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

☐ ☐ ☐ ☐

iii. Met the Manifest requirements?

☐ ☐ ☐ ☐

b. Importing Hazardous Waste, has the generator met the manifest requirements?

☐ ☐ ☐ ☐



Remarks:

QUESTIONS 4 a 1-X PERTAINING TO  
CONTAINERS — THERE ARE NO CONTAINERS  
OF WASTE NOW BEING ACCUMULATED BUT  
I AM ASSURED THAT THEY WOULD BE HANDLED  
ACCORDING TO REGULATIONS. MR KOGLIN WAS KNOWLEDGEABLE  
ABOUT HOW TO HANDLE THEM.

FOR ALL PRACTICAL PURPOSES, COMPANY IS A  
SMALL QUANTITY GENERATOR. NOTIFIED IN ORDER TO  
HAVE EPA ID. NUMBER REQUIRED BY HAULERS  
WHO WOULD NOT TAKE EVEN ACT 136 WASTE  
WITHOUT IT. SINCE SHIPMENT OF CAUSTIC  
SODIUM HYDROXIDE + ALK. CLEANING COMPOUND  
ON 1/11/82, HAVE GENERATED NO HAZARDOUS  
WASTE.



November 9, 1981  
Notice No. 201A


N O T I C E

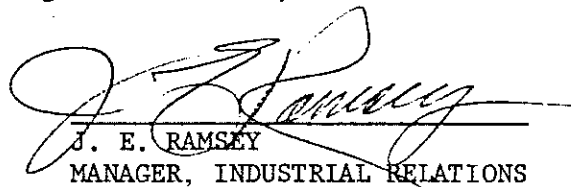
The Watertender/Chlorine System Tender has been reviewed by the Bargaining Committee and approved by the membership.

There is need for a safety backup volunteer, from day maintenance personnel, to stand at the door of the Chlorine Room when tanks are changed, in the absence of an Oiler/Watertender or Tour Pipefitter Relief or Tour Millwright Relief.

The volunteer must pass a physical examination allowing them to work with chlorine, including wearing a respirator.

Any day maintenance person willing to volunteer is asked to so indicate to Mrs. Kennedy by Monday, November 16, 1981.

  
J. R. SCOHY  
MANUFACTURING MANAGER

  
J. E. RAMSEY  
MANAGER, INDUSTRIAL RELATIONS

ssh





TO DAY MAINTENANCE PERSONNEL  
FROM J. R. SCOBY/J. E. RAMSEY  
SUBJECT POLLING FOR OILER/WATERTENDER

---

DATE November 9, 1981  
CC:

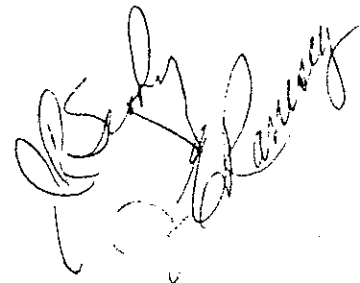
There is occasion when both the Tour Pipefitter Relief and Tour Millwright Relief are scheduled into those respective classifications for absences of three (3) days or more. When this happens, and an Oiler/Watertender is absent for three (3) days or more, maintenance personnel qualified for the Oiler/Watertender are polled for the opening.

With the start up of the Chlorine System, those employees accepting the Oiler/Watertender polling under the above stated circumstance, may be on a day shift opening and thereby subject to changing chlorine tanks or may be the safety backup.

Because of this involvement, these personnel will also be required to pass a physical examination allowing them to work with chlorine, including wearing a respirator.

We ask that those of you who will accept the polling for Oiler/Watertender as so stated above, to indicate to Mrs. Kennedy by Monday, November 16, 1981.

ssh

A handwritten signature in dark ink, appearing to read "J. R. Scooby", is located in the bottom right corner of the document. The signature is stylized and cursive.



TO J. E. RAMSEY  
FROM R. W. FERGUSON

DATE November 10, 1981  
CC:

SUBJECT PHYSICALS FOR OILER/WATERTENDERS AND VOLUNTEER FOR THE CHLORINE OPERATION

---

I called Dr. Bottomley regarding the test procedures required for the chlorine operation. I also informed him our projected start date is the first week in December. We reviewed the test requirements. He said he would have to get back with me as he wasn't sure he could perform the test in his office.

He called back and informed me that the test will have to be taken at Port Huron Hospital. He doesn't have the equipment for the pulmonary function test or the x-rays.

He said it would cost an estimated \$100.00 per person, and would take approximately two hours each. He would make arrangements through his office as far as scheduling. He also said not more than two persons a day because of the time involved.

Awaiting your approval to start the test.

RWF/ssh

cc: T. E. Gallagher  
J. R. Scohy  
M. E. Kennedy





# Occupational Health Guideline for Chlorine

## INTRODUCTION

This guideline is intended as a source of information for employees, employers, physicians, industrial hygienists, and other occupational health professionals who may have a need for such information. It does not attempt to present all data; rather, it presents pertinent information and data in summary form.

## SUBSTANCE IDENTIFICATION

- Formula:  $\text{Cl}_2$
- Synonyms: None
- Appearance and odor: Amber liquid or greenish-yellow gas with a characteristic irritating odor.

## PERMISSIBLE EXPOSURE LIMIT (PEL)

The current OSHA standard for chlorine is a ceiling level of 1 part of chlorine per million parts of air (ppm) averaged over a 15-minute period (*Federal Register*, Vol. 43, No. 237, pp. 57601-03, 8 December 1978). This may also be expressed as 3 milligrams of chlorine per cubic meter of air ( $\text{mg}/\text{m}^3$ ). NIOSH has recommended that the permissible exposure limit be reduced to 0.5 ppm ( $1.5 \text{ mg}/\text{m}^3$ ) measured over a 15-minute period. The NIOSH Criteria Document for Chlorine should be consulted for more detailed information.

## HEALTH HAZARD INFORMATION

### • Routes of exposure

Chlorine can affect the body if it is inhaled, or if it comes in contact with the eyes or skin.

### • Effects of overexposure

**1. Short-term Exposure:** Chlorine gas may cause severe irritation of the eyes and respiratory tract with tearing, runny nose, sneezing, coughing, choking, and chest pain. Severe breathing difficulties may occur which may be delayed in onset. Pneumonia may result. Severe exposures may be fatal. In high concentrations chlorine may irritate the skin and cause sensations of burning and

prickling, inflammation, and blister formation. Liquid chlorine may cause eye and skin burns on contact.

**2. Long-term Exposure:** Repeated or prolonged exposure to chlorine may cause corrosion of the teeth and skin irritation.

**3. Reporting Signs and Symptoms:** A physician should be contacted if anyone develops any signs or symptoms and suspects that they are caused by exposure to chlorine.

### • Recommended medical surveillance

The following medical procedures should be made available to each employee who is exposed to chlorine at potentially hazardous levels:

—A complete history and physical examination: The purpose is to detect pre-existing conditions that might place the exposed employee at increased risk, and to establish a baseline for future health monitoring. Examination of the eyes, respiratory tract, cardiac status, and teeth should be stressed. The skin should be examined for evidence of chronic disorders. Simple tests of olfactory ability should be carried out.

—14" x 17" chest roentgenogram: Chlorine causes human lung damage. Surveillance of the lungs is indicated.

—FVC and FEV (1 sec): Chlorine is a respiratory irritant. Persons with impaired pulmonary function may be at increased risk from exposure. Periodic surveillance is indicated.

**2. Periodic Medical Examination:** The above medical examinations are to be repeated on an annual basis, except that an x-ray is necessary only when indicated by the results of pulmonary function testing or by signs and symptoms of respiratory disease.

### • Summary of toxicology

Chlorine gas is a severe irritant of the eyes, mucous membranes, and skin. The odor threshold for chlorine has been reported at various concentrations and appears to be between 0.02 and 0.2 ppm for most subjects. Nasal irritation and coughing occur at about 0.5 ppm. There is evidence that olfactory fatigue develops at these low concentrations and that some tolerance is built up in

These recommendations reflect good industrial hygiene and medical surveillance practices and their implementation will assist in achieving an effective occupational health program. However, they may not be sufficient to achieve compliance with all requirements of OSHA regulations.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Public Health Service    Centers for Disease Control  
National Institute for Occupational Safety and Health

U.S. DEPARTMENT OF LABOR  
Occupational Safety and Health Administration



chronic industrial exposures. An accidental exposure of humans to unmeasured but high concentrations for a brief period caused burning of the eyes with lacrimation, burning of the nose and mouth with rhinorrhea, cough, choking sensation and substernal pain. These symptoms were frequently accompanied by nausea, vomiting, headache, dizziness, and sometimes syncope. Of 33 of the victims who were hospitalized, all suffered tracheobronchitis, 23 progressed to pulmonary edema, and of those, 14 to pneumonitis. Respiratory distress and substernal pain generally subsided within the first 72 hours; cough increased in frequency and severity after 2 to 3 days and became productive of thick mucopurulent sputum; cough disappeared by the end of 14 days. Prolonged or repeated exposure to 5 ppm may cause respiratory complaints, corrosion of the teeth, and inflammation of the mucous membranes of the nose. It has been reported that chronic exposure may increase susceptibility to respiratory infections. In high concentrations, chlorine irritates the skin and causes sensations of burning and pricking, inflammation, and vesicle formation. Liquid chlorine causes eye and skin burns on contact.

## CHEMICAL AND PHYSICAL PROPERTIES

### • Physical data

1. Molecular weight: 70.9
2. Boiling point (760 mm Hg):  $-34.1^{\circ}\text{C}$  ( $-29.3^{\circ}\text{F}$ )
3. Specific gravity (water = 1): 1.41 (liquid)
4. Vapor density (air = 1 at boiling point of chlorine): 2.5
5. Melting point:  $-101^{\circ}\text{C}$  ( $-149^{\circ}\text{F}$ )
6. Vapor pressure at  $20^{\circ}\text{C}$  ( $68^{\circ}\text{F}$ ): Greater than 1 atmosphere
7. Solubility in water, g/100 g water at  $20^{\circ}\text{C}$  ( $68^{\circ}\text{F}$ ): 0.7
8. Evaporation rate (butyl acetate = 1): Not applicable

### • Reactivity

1. Conditions contributing to instability: Elevated temperatures may cause cylinders to burst.
2. Incompatibilities: Contact with combustible substances (such as gasoline and petroleum products, turpentine, alcohols, acetylene, hydrogen, ammonia, and sulfur) and finely divided metals may cause fires and explosions.
3. Hazardous decomposition products: None.
4. Special precautions: Chlorine will attack some forms of plastics, rubber, and coatings.

### • Flammability

1. Not combustible, but is a strong oxidizer.
2. Compressed gas cylinders containing chlorine should be stored in accordance with 29 CFR 1910.101.

### • Warning properties

1. Odor Threshold: The odor threshold for chlorine has been reported by several authors to be 0.01 ppm (Summer, May, and Stern).
2. Eye Irritation Level: Grant states that "exposure

to concentrations of chlorine gas as low as 3 to 6 ppm in air causes sensation of stinging and burning of the eyes of some individuals, with associated blepharospasm, redness, and watering, but on continued exposure sensitivity may decrease and signs and symptoms diminish."

The ILO states that eye irritation may occur at 1 to 3 ppm.

3. Other Information: Patty states that "exposures to low concentrations, 10 to 20 mg/m<sup>3</sup> or 3 to 6 ppm, cause a stinging or burning sensation in the eyes, nose and throat, and sometimes headache due to irritation of the accessory nasal sinuses. There may be redness and watering of the eyes, sneezing, coughing, and huskiness or loss of the voice. Bleeding of the nose may occur, and sputum from the pharynx and trachea may be blood-tinged. There is little or no chest pain other than the muscular soreness associated with excessive coughing."

4. Evaluation of Warning Properties: Through its odor, chlorine can be detected below the permissible exposure limit, and through its irritant effects, chlorine can be detected within several times of the permissible exposure limit. For the purposes of this guideline, therefore, chlorine is treated as a material with good warning properties.

## MONITORING AND MEASUREMENT PROCEDURES

### • Ceiling Evaluation

Measurements to determine employee ceiling exposure are best taken during periods of maximum expected airborne concentrations of chlorine. Each measurement should consist of a fifteen (15) minute sample or series of consecutive samples totalling fifteen (15) minutes in the employee's breathing zone (air that would most nearly represent that inhaled by the employee). A minimum of three (3) measurements should be taken on one work shift and the highest of all measurements taken is an estimate of the employee's exposure.

### • Method

Sampling and analyses may be performed by collection of vapors using an adsorption tube with a subsequent chemical analysis of the adsorption tube. Also, detector tubes certified by NIOSH under 42 CFR Part 84 or other direct-reading devices calibrated to measure chlorine may be used. An analytical method for chlorine is in the *NIOSH Manual of Analytical Methods*, 2nd Ed., Vol. 1, 1977, available from the Government Printing Office, Washington, D.C. 20402 (GPO No. 017-033-00267-3).

## RESPIRATORS

• Good industrial hygiene practices recommend that engineering controls be used to reduce environmental concentrations to the permissible exposure level. However, there are some exceptions where respirators may





be used to control exposure. Respirators may be used when engineering and work practice controls are not technically feasible, when such controls are in the process of being installed, or when they fail and need to be supplemented. Respirators may also be used for operations which require entry into tanks or closed vessels, and in emergency situations. If the use of respirators is necessary, the only respirators permitted are those that have been approved by the Mine Safety and Health Administration (formerly Mining Enforcement and Safety Administration) or by the National Institute for Occupational Safety and Health.

- In addition to respirator selection, a complete respiratory protection program should be instituted which includes regular training, maintenance, inspection, cleaning, and evaluation.

## PERSONAL PROTECTIVE EQUIPMENT

- Employees should be provided with and required to use impervious clothing, gloves, face shields (eight-inch minimum), and other appropriate protective clothing necessary to prevent any possibility of skin contact with liquid chlorine, and to prevent the skin from becoming frozen from contact with vessels containing liquid chlorine.
- Where there is any possibility of exposure of an employee's body to liquid chlorine, facilities for quick drenching of the body should be provided within the immediate work area for emergency use.
- Non-impervious clothing which becomes contaminated with chlorine should be removed immediately and not reworn until the chlorine is removed from the clothing.
- Employees should be provided with and required to use splash-proof safety goggles where there is any possibility of liquid chlorine contacting the eyes.
- Where there is any possibility that employees' eyes may be exposed to liquid chlorine, an eye-wash fountain should be provided within the immediate work area for emergency use.

## SANITATION

- Skin that becomes contaminated with chlorine should be immediately washed or showered to remove any chlorine.

## COMMON OPERATIONS AND CONTROLS

The following list includes some common operations in which exposure to chlorine may occur and control methods which may be effective in each case:

### Operation

### Controls

Use as chlorinating and oxidizing agent in organic synthesis, manufacture of solvents, automotive antifreeze and antiknock compounds, plastics, resins, elastomers, pesticides, refrigerants, bleaching, and inorganic chemicals

Process enclosure; local exhaust ventilation; personal protective equipment

Use as fluxing, purification, and extraction agent in metallurgy

Process enclosure; local exhaust ventilation

Use as bacteriostat, disinfectant, odor control, and demulsifier in treatment of water and sewage

Process enclosure; local exhaust ventilation

Use as a chlorinating agent in the rubber and coatings industry

Process enclosure; local exhaust ventilation

Use as bleaching agent, cleaning agent, and disinfectant in laundries, dishwashers, cleaning powders, cleaning dairy equipment, and bleaching cellulose

Process enclosure; local exhaust ventilation; general dilution ventilation; personal protective equipment

## EMERGENCY FIRST AID PROCEDURES

In the event of an emergency, institute first aid procedures and send for first aid or medical assistance.

### • Eye Exposure

If liquid chlorine or high concentrations of chlorine gas get into the eyes, wash eyes immediately with large amounts of water, lifting the lower and upper lids occasionally. Get medical attention immediately. Contact lenses should not be worn when working with this chemical.

### • Skin Exposure

If liquid chlorine or high concentrations of chlorine gas get on the skin, immediately flush the contaminated skin with water. If liquid chlorine or high concentrations of chlorine gas penetrate through the clothing, remove the clothing and immediately flush the skin with water. If irritation is present after washing, get medical attention.

### • Breathing

If a person breathes in large amounts of chlorine, move the exposed person to fresh air at once. If breathing has stopped, perform artificial respiration. Keep the affected person warm and at rest. Get medical attention as soon as possible.



- Rescue

Move the affected person from the hazardous exposure. If the exposed person has been overcome, notify someone else and put into effect the established emergency rescue procedures. Do not become a casualty. Understand the facility's emergency rescue procedures and know the locations of rescue equipment before the need arises.

## LEAK PROCEDURES

- Persons not wearing protective equipment and clothing should be restricted from areas of leaks until cleanup has been completed.

- If chlorine is leaked, the following steps should be taken:

1. Ventilate area of leak to disperse gas.
2. Stop flow of gas. If source of leak is a cylinder and the leak cannot be stopped in place, remove the leaking cylinder to a safe place in the open air, and repair the leak or allow the cylinder to empty through a reducing agent, such as sodium bisulfide and sodium bicarbonate.

- Waste disposal method:

Chlorine may be disposed of by allowing gas to disperse at a safe location.

## REFERENCES

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- Kaufman, J., and Burkons, D.: "Clinical, Roentgenologic, and Physiologic Effects of Acute Chlorine Exposure," *Archives of Environmental Health*, 23:29-34, 1971.

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- National Institute for Occupational Safety and Health, U.S. Department of Health, Education, and Welfare: *Criteria for a Recommended Standard . . . . Occupational Exposure to Chlorine*, HEW Publication No. (NIOSH) 76-170, GPO No. 017-033-00176-6, U.S. Government Printing Office, Washington, D.C., 1976.

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- Stern, A. C. (ed.): *Air Pollution* (2nd ed.), Academic Press, New York, 1968.

- Summer, W.: *Odor Pollution of Air: Causes and Control*, L. Hill, London, 1975.



## RESPIRATORY PROTECTION FOR CHLORINE

Condition	Minimum Respiratory Protection* Required Above 1 ppm
Gas Concentration	
25 ppm or less	<p>A chemical cartridge respirator with a full facepiece and cartridge(s) providing protection against chlorine.**</p> <p>A gas mask with a chin-style or a front- or back-mounted canister providing protection against chlorine.**</p> <p>Any supplied-air respirator with a full facepiece, helmet, or hood.</p> <p>Any self-contained breathing apparatus with a full facepiece.</p>
Greater than 25 ppm*** or entry and escape from unknown concentrations	<p>Self-contained breathing apparatus with a full facepiece operated in pressure-demand or other positive pressure mode.</p> <p>A combination respirator which includes a Type C supplied-air respirator with a full facepiece operated in pressure-demand or other positive pressure or continuous-flow mode and an auxiliary self-contained breathing apparatus operated in pressure-demand or other positive pressure mode.</p>
Fire Fighting	Self-contained breathing apparatus with a full facepiece operated in pressure-demand or other positive pressure mode.
Escape	<p>Any full-facepiece gas mask providing protection against chlorine.**</p> <p>Any escape self-contained breathing apparatus with a full facepiece.</p>

\*Only NIOSH-approved or MSHA-approved equipment should be used.

\*\*Chlorine is a strong oxidizer and should not come in contact with oxidizable materials.

\*\*\*Use of supplied-air suits may be necessary to prevent skin contact while providing respiratory protection from airborne concentrations of chlorine; however, this equipment should be selected, used, and maintained under the immediate supervision of trained personnel. Where supplied-air suits are used above a concentration of 25 ppm, an auxiliary self-contained breathing apparatus operated in positive pressure mode should also be worn.



DIST: KWT ✓  
JRS  
FAL  
F. WINKLE (3)  
BARB. COMM (5)

POSITION DESCRIPTION

POSITION: Oiler/Watertender  
Oiler/Watertender/Chlorine System Tender

DEPARTMENT: Maintenance

SUPERVISOR: Maintenance Superintendent/Shift Supervisor

PURPOSE: To describe the responsibilities of the existing Oiler/Watertender position which are functional 24 hours a day, seven days a week and to expand the duties of the extra (days only, seven days a week) Oiler/Watertender to Oiler/Watertender/Chlorine System Tender.

QUALIFICATIONS: Because the Oiler/Watertender is a tour job which as part of the tour scheduling rotates into the Oiler/Watertender/Chlorine System Tender, the qualifications will be based on the most demanding of the two positions which is the Oiler/Watertender/Chlorine System Tender. The individuals who would hold the dual classification or fill in in the dual classification must pass a physical examination allowing them to work with Chlorine, including wearing a respirator. Individuals not able to meet this qualification will not be allowed to hold this classification. (At the time of this writing, it is felt that two individuals within the existing group will not pass the physical examination. The qualifications will be waived for these two individuals only, through to December 31, 1987. Should these two, or either of the two, individuals leave the classification prior to December 31, 1987, the individual, or individuals, bidding into the classification must meet the qualifications. During the period that the waiver is in effect, the Company will agree to allow the two individuals who do not pass the physical examination not to perform the duties of the Oiler/Watertender/Chlorine System Tender or the safety backup for the Oiler/Watertender/Chlorine System Tender. The safety backup substitute for the two individuals will be drawn from day Maintenance in the following order when needed:

1. Tour Pipefitter Relief
2. Tour Millwright Relief
3. Volunteer who has passed physical examination

It is the intent of this waiver to satisfy conditions which are felt to exist prior to proof of their existence. The waiver applies only upon failure of the physical examination given by the Company physician. It is also necessary, should the conditions exist, for one of the two individuals to trade shifts with one of the three remaining Oiler/Watertenders to make the waiver workable.)





RATE OF PAY: Oiler/Watertender - per contract.

Oiler/Watertender/Chlorine System Tender - Oiler/Watertender rate plus 20¢/hr. (Applies only to individual performing job while on days.)

RESPONSIBILITIES:

I. Oiler/Watertender

- A. Lubrication of equipment in accordance with prior training and instructions and maintenance of lubrication log.
- B. Maintenance of daily check sheet with notations reporting the unusual.
- C. Maintenance of working lubricants inventory including emptying of drums and replacement of bungs.
- D. Maintenance of water supply to the mill.
- E. Maintenance of effluent treatment systems.

1. Clarifier System

- a. Shutdown and startup of clarifier consistent with orderly shutdowns and startup of mill and effluent quality at mill shutdowns and startups.
- b. Sampling of clarifier effluent at specified frequencies and reporting of extremes.
- c. Scrape solids from shake screen.
- d. Check pressure and air flow and note change and report or remedy immediately. Plugging of bleedlines must be remedied immediately.
- e. Raking of sewer screen as required.
- f. Reporting or remedying mechanical condition of equipment which varies from normal.

2. Lamella System

- a. Shutdown and startup consistent with orderly shutdowns and startup of mill and effluent quality at mill shutdowns and startup.
- b. Sample intake and effluent at specified frequency.

II. Oiler/Watertender/Chlorine System Tender

- A. Maintenance of water supply to the mill including:



1. Startup and shutdown of river pumps
2. Startup and shutdown of micro-strainers and supply of water to clearwell. Cleaning of micro-strainers as required.
3. Startup and shutdown of mill pumps.
4. Maintenance of mill filters.

B. Maintenance of Effluent Treatment Systems

1. Clarifier System

- a. Shutdown and startup of clarifier consistent with orderly shutdowns and startup of mill and effluent quality at mill shutdowns and startups.
- b. Sampling of clarifier effluent at specified frequencies and reporting extremes.
- c. Scrape solids from shake screens and empty solids container as required.
- d. Check pressure and air flow and note change and report or remedy immediately. Plugging of bleedlines must be remedied immediately.
- e. Raking of sewer screen as required.
- f. Reporting or remedying mechanical condition of equipment which varies from normal.
- g. Hose off clarifier skimmers to prevent heavy buildup.
- \*h. Mixing of clarifier chemicals, changing chemical barrels, and maintaining flows to system according to instructions.

2. Lamella System

- a. Shutdown and startup consistent with orderly shutdowns and startup of mill and effluent quality at mill shutdowns and startup.
- b. Sample intake and effluent at specified frequency.
- \*c. Mixing of Lamella polymer and maintaining flow to system according to outlined instructions.
- d. Wash down Lamella at specified frequency.



C. Chlorinator

1. Maintain flow to system. Includes changing tanks as required and making adjustments to controls.
2. Check for chlorine leaks at specified frequency and location.
3. Adhere to all safety regulations and maintain personnel safety equipment according to instructions.

While it is intended that this should be an outline of responsibilities of the Oiler/Watertender - Oiler/Watertender/Chlorine System Tender, it is not to be construed as to prevent the continuation of present duties not specifically mentioned nor to prevent the performance of duties as directed by supervision. Further, it must be recognized that changing needs may require specific changes to duties from time to time.



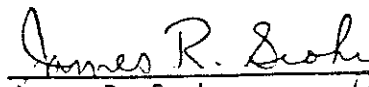
TO Oiler/Watertenders  
Oiler/Watertenders/Chlorine System Tenders  
FROM James R. Scohy  
SUBJECT Duties

DATE January 11, 1982  
CC: Notice No. 4 -A

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N O T I C E

During the time that the Oiler/Watertender/Chlorine System Tender is performing those specific responsibilities (i.e. changing cylinders, mixing polymers) and it becomes necessary for his Oiler/Watertender responsibilities to be performed, it will be the automatic responsibility of the Oiler/Watertender on duty to perform those Oiler/Watertender responsibilities during that time only.

  
James R. Scohy  
Manufacturing Manager

JRS/jlw

---

CC: Local 1017 - 10

Mike Christopher - 1

Jr. Smith - 2

